

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

AMANDA STALLARD, *et al.*

v.

FIFTH THIRD BANK, *et al.*

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**MOTION FOR THE PRO HAC VICE
ADMISSION OF ATTORNEY KEITH M. STERN**

Plaintiffs Amanda Stallard, Tamika Strong, Catherine Jarvis, and Lisa Miller, on behalf of themselves and others similarly situated and by and through their undersigned Attorney Peter Winebrake, respectfully move for the *pro hac vice* admission of Attorney **Keith M. Stern**. Attorney Stern's *pro hac vice* admission should be permitted, pursuant to Local Civil Rule 83.2.B, for the reasons described below:

1. Attorney Winebrake, who serves as Attorney Stern's sponsor, is licensed to practice in the Commonwealth of Pennsylvania (PA Bar No. 80496) and is a member in good standing of this Court. Attorney Winebrake knows Attorney Stern to be an attorney of high character, competence, and integrity.

2. Attorney Stern maintains an office at 1515 S. Federal Highway, Suite 404, Boca Raton, FL 33432. His office telephone number is (561) 447-8888; his office fax number is (561) 447-8831; and his email address is ksfern@shavitzlaw.com. Attorney Stern is a member in good standing of the bar of the state of Florida (admitted September 18, 2000). He also is a member in good standing of the bars of the following federal courts: the Southern District of Florida (admitted July 13, 2001); the Middle District of Florida (admitted June 28, 2004); the Northern

District of Florida (admitted July 25, 2005); the Eleventh Circuit Court of Appeals (admitted May 29, 2001); and the District of Colorado (admitted December 1, 2011).

3. Attorney Stern has never been the subject of any disciplinary action in any jurisdiction and has never been denied admission to any court.

4. As indicated by the accompanying declaration, Attorney Stern is a registered user of this Court's ECF system and has read and understands this Court's Local Rules.

WHEREFORE, Plaintiffs respectfully request that the Court admit Attorney Keith M. Stern *pro hac vice*. A proposed order is attached.

Dated: September 30, 2012

/s/ Peter Winebrake
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